

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

LopezTalent Management LLC and
Josanne Lopez,

Case No. 1:21-cv-02795 BMC

Plaintiffs,

v.

**DECLARATION OF LAURA
COATES**

Laura Coates,

Defendant.

LAURA COATES, deposes and states as follows:

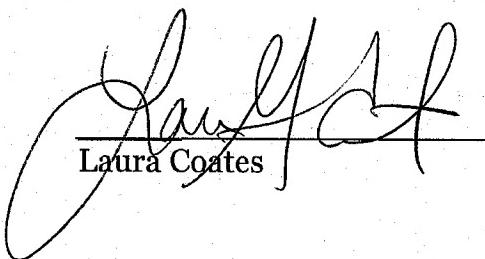
1. My name is Laura Coates and I submit this Declaration in support of my motion to seal the Complaint in this matter to protect the confidentiality of certain information improperly disclosed by Plaintiffs in their Complaint.
2. For a period of time I retained Plaintiff LopezTalent to provide certain management services for me. To facilitate this work, I provided certain information to Plaintiffs, with the express understanding that the information was confidential and should not be publicly disclosed. Indeed, it is well understood in the industry that media contracts are trade secret, confidential and proprietary.
3. I did not authorize Plaintiffs to make public disclosure of my confidential information. Nonetheless, in their Complaint they purport to disclose my specific compensation information, which disclosure is in violation of confidentiality agreements.

4. My agreements, referred to in Plaintiff's Complaint, all have confidentiality terms, and were undertaken with the understanding that specific compensation information would be treated as confidential and trade secret.

5. I request that the Court seal the Complaint to protect my confidentiality rights and the rights of these third parties.

I declare under penalty of perjury that everything I have stated in this document is true and accurate.

May 19, 2021



Laura Coates